

Docket: 01-022N11-B

<u>Comment Number</u> =====	<u>Date Received</u> =====	<u>Submitter/Firm/Subject</u> =====	<u>Pages</u> =====	<u>Date of Document</u> =====
09505	04/24/2003	TARA L. MURRAY BMW 2003 MODEL YEAR INFORMATION	14	01/27/2003
09506	04/24/2003	TARA L. MURRAY BMW OF NORTH AMERICA 2004 MODEL YEAR INFORMATION	5	02/27/2003
09507	04/24/2003	KEITH PFANNENSTIEL OPTIMA BUS CORP.	11	02/12/2003
09508	04/24/2003	JUSTIN W. WINSLOW STILES TRAILER CO.	2	03/28/2003
09509	04/24/2003	RICHARD KEMPF INTERNATIONAL TRUCK & ENGINE CORP.	10	01/09/2003
09510	04/24/2003	RICHARD KEMPF INTERNATIONAL TRUCK & ENGINE CORP.	9	01/31/2003
09511	04/24/2003	RICHARD KEMPF INTERNATIONAL TRUCK & ENGINE CORP.	9	02/17/2003
09512	04/24/2003	RICHARD KEMPF INTERNATIONAL TRUCK & ENGINE CORP.	9	03/04/2003
09513	04/24/2003	RICHARD KEMPF INTERNATIONAL TRUCK & ENGINE CORP.	9	03/11/2003
09514	04/24/2003	RICHARD KEMPF INTERNATIONAL TRUCK & ENGINE CORP.	9	03/25/2003
09515	04/24/2003	DANA M. MUSCATO PHOENIX MOTORCARS INC.	3	02/28/2003
09516	04/24/2003	OUTLANDER TRAILERS, LLC	1	02/02/2003
09517	04/24/2003	WEST COAST ABT INC.	1	02/24/2003
09518	04/24/2003	ACTION TRAILERS	1	00/00/0000
09519	04/24/2003	CARTER'S CUSTOM CYCLES	1	02/11/2003
09520	04/24/2003	JOHN WISELEY CUSTOMBIKES OF LAUDERDALE	2	03/11/2003

ORIGINAL

Stiles Trailer Company
2589 North Prospect Avenue
Milwaukee, WI 53211

March 28, 2003

01-022-N11B-9508

Mr. David Coleman
National Highway Traffic Safety Administration
400 7th Street, SW Room 6111
Washington, DC 20590

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Mr. Coleman:

As required by §565.7(c), I am writing to inform you of an update to Stiles Trailer Company's VIN calculation formula. As noted at Section 5(b) below, we have added a production facility in Menominee, MI which will be reflected as "2" in position 11.

VIN Legend

The following chart identifies the VIN sections and positions which are defined more thoroughly below:

Section	MFG Ident.			Vehicle Attributes					√	Model Year	Plant	Sequential Manufacturing Number					
Position	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

Section

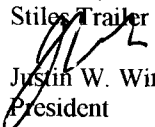
1. Manufacturer Identification (Positions 1-3)- As confirmed in a fax dated April 17, 2002, Cathy Douds of the Society of Automotive Engineers (SAE) assigned Stiles the 3-digit manufacturer identification of **5KR**.
2. Vehicle Attributes (Positions 4-8)- Stiles will adopt SAE's suggested trailer manufacturers encoding system to describe vehicle attributes.
 - a. Position 4- Type of Trailer. Stiles currently manufactures 3 types of trailers to be encoded as follows:
 - i. Utility Trailers/ Bumper Pull= 1
 - ii. Snowmobile Trailers (wheels/axel under chassis)/ Bumper Pull = 2
 - iii. Car Haulers/ Bumper Pull = 3
 - b. Position 5- Body Type. Stiles will identify body type based on trailer side construction to be encoded as follows:
 - i. Flatbed= 1
 - ii. Wood Stake Bed= 2
 - iii. Steel Rail Sides= 3
 - iv. Steel Rail Sides/ Steel Mesh Walls= 4
 - c. Position 6 and 7 (Length)- Stiles will identify overall length rounded to the nearest whole foot adhering to the convention of measurement from the center of the pull ball to the rearmost portion of the trailer. Position 6 will represent the tens digit and Position 7 will represent the ones digit.
 - d. Position 8- Number of Axles.
3. Check Digit (Position 9)- Stiles will conform to the check digit convention as required by §565.6 (c).
4. Model Year (Position 10)- Stiles will conform to the model year convention as required by §565.6 (d). (2002=2, 2003=3, 2003=4, etc)

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5. Plant of MFG (Position 11)- Stiles will identify plant of MFG to be encoded as follows:
 - a. 5713 Chicken Shack Road Oconto, Wisconsin 54153= 1
 - b. **W6252 18th Avenue Menominee, MI 49858**
6. Sequential Manufacturing Number (Positions 12-17)- Stiles will identify the sequential manufacturing number in Positions 12-17 using "0" as a place filler for all positions unnecessary to identify the unit number. With each newly manufactured trailer, Stiles will continue to build upon current Sequential Manufacturing Number and will not revert to a Sequential Manufacturing Number of "000001" with a change in Model Year (Position 10).

Thanks again for all of your help.

Sincerely,
Stiles Trailer Company


Justin W. Winslow
President